

DOLORES Y. LEAL (134176)
OLIVIA FLECHSIG (334880)
ALLRED, MAROKO & GOLDBERG
6300 Wilshire Blvd. Suite 1500
Los Angeles, CA 90048-5217
(323) 653-6530
dleal@amglaw.com
oflechsig@amglaw.com

Attorneys for Plaintiff MARK SNOOKAL

(counsel for Defendant on next page)

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MARK SNOOKAL, an individual,)	CASE NO.: 2:23-cv-6302-HDV-AJR
)	
)	
Plaintiff,)	JOINT STIPULATION TO
)	CONTINUE THE SEPTEMBER 19,
)	2024 EXPERT DISCOVERY CUT-
vs.)	OFF AND THE OCTOBER 29, 2024
)	MOTION HEARING DEADLINE
)	
CHEVRON USA, INC., a California)	
Corporation, and DOES 1 through)	District Judge: Hon. Hernan D. Vera
10, inclusive,)	Magistrate Judge: Hon. A. Joel Richlin
)	Action Filed: August 3, 2023
)	Trial Date: February 4, 2025
)	
Defendants.)	
)	
)	

1 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
2 A Limited Liability Partnership
3 Including Professional Corporations
4 TRACEY A. KENNEDY (150782)
5 ROBERT E. MUSSIG (240369)
6 SARAH FAN (328282)
7 333 South Hope Street, 43rd Floor
8 Los Angeles, CA 90071-1422
9 T: (213) 620-1780
10 tkennedy@sheppardmullin.com
11 rmussig@sheppardmullin.com
12 sfan@sheppardmullin.com

13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
Attorneys for Defendant CHEVRON USA, INC.

1 Plaintiff Mark Snookal (“Plaintiff”) and Defendant Chevron USA, Inc.
2 (Defendant”) (collectively “Parties”), by through their respective attorneys of
3 record, and pursuant to Federal Rule of Civil Procedure Rule 16(b)(4); Local Rule
4 7-1; and the Court’s Civil Standing Order (Dkt 10) Section XIV, hereby stipulate
5 to, and respectfully request, a continuance of the September 19, 2024 Expert
6 Discovery Cut-Off and the October 29, 2024 Motion Hearing Deadline set forth in
7 the Court’s Scheduling Conference and Order Setting Pretrial and Trial Schedule
8 (Dkt 19).

9 Parties are cognizant and respectful of the Court’s Civil Trial Order which
10 notes that the pretrial and trial dates set by the Court are firm and that stipulations
11 to request a continuance “must contain a detailed factual showing of good cause
12 and due diligence demonstrating the necessity for the continuance and a description
13 of the parties’ efforts taken to advance the litigation.” (Court’s Civil Trial Order at
14 p. 18:8-13). The Parties believe such good cause for a continuance exists as follows,
15 despite the due diligence of the Parties:

- 16 1. Under the existing schedule, Expert Discovery Cut-Off is on September
17 17, 2024, which is fewer than 30 days after Parties made their Initial
18 Expert Disclosures on the ordered deadline of August 20, 2024. (See Dkt
19 19). Parties anticipate the need to take expert witness depositions and
20 engage in document discovery related to these experts, which cannot
21 reasonably be completed in fewer than 30 days. (Declaration of Olivia
22 Flechsig in Support of Parties’ Joint Stipulation to Continue the September
23 19, 2024 Expert Discovery Cut-Off and the October 29, 2024 Motion
24 Hearing Deadline (hereinafter “Flechsig Decl.”) at ¶ 3).
- 25 2. Under the existing schedule, the Last Date to Hear Motions is October 29,
26 2024. (See Dkt 19). Since the Court hears motions on Thursdays, the
27 functional last day to hear motions is Thursday, October 24, 2024.
28 Defendant e-mailed Plaintiff a Motion for Summary Judgment on August

22, 2024, intending to have Defendant's Motion heard on October 24, 2024. (Flechsigg Decl. at ¶ 6). However, Plaintiff's counsel has a trial in another matter scheduled for October 24, 2024. (Id. at ¶ 7).

3. In addition, Parties are still meeting and conferring to find mutually agreeable dates for Plaintiff to take a handful of depositions. (Id. at ¶ 5). These depositions were noticed in July of 2024, in advance of the Court's Fact Discovery Cut-Off. (Id. at ¶ 5, Exhibit A). This discovery will be necessary for the disposition of Defendant's Motion for Summary Judgment. (Id. at ¶ 5).

4. Notwithstanding the outstanding discovery required, Parties have been working to advance this case. Discovery is well underway, and Parties have both propounded and answered written discovery requests; propounded and answered document requests; and have noticed and taken witness depositions. (Id. at ¶ 8). Parties also participated in private mediation on June 25, 2024, though settlement negotiations were not successful. (Id. at ¶ 9).

Therefore, in order to complete the outstanding discovery, including expert witness discovery, and to allow for the disposition of Defendant's Motion for Summary Judgment, Parties require additional time.

Parties have not requested any prior continuances in this case, and Parties anticipate that the requested continuances are not intended to disturb the current trial or pretrial filing dates. (Id. at ¶ 10).

For these reasons, the Parties respectfully request that the Court grant a continuance of the pretrial dates as follows:

Event	Current Date	New Proposed Date
Expert Discovery Cut-Off	September 17, 2024	October 10, 2024
Last Date to <u>Hear</u> Motions	October 29, 2024	November 14, 2024

1 DATED: August 29, 2024

ALLRED, MAROKO & GOLDBERG

2
3
4 By: /s/ Olivia Flechsig

DOLORES Y. LEAL

5 OLIVIA FLECHSIG

6 Attorneys for Plaintiff,

7 **MARK SNOOKAL**

8
9 DATED: August 29, 2024

SHEPPARD, MULLIN, RICHTER &
10 HAMPTON LLP

11
12 By: /s/ Sarah Fan

13 TRACEY A. KENNEDY

14 ROBERT E. MUSSIG

15 SARAH FAN

16 Attorneys for Defendant,

17 **CHEVRON U.S.A. INC.**

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Attestation of Concurrence in the Filing

The ECF filer, Attorney Olivia Flechsig, attests that all other signatories listed, on whose behalf this filing is submitted, concur in the filing’s content and have authorized the filing.